

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net

10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company as Trustee for the Certificate-*
11 *holders of the Morgan Stanley ABS Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through*
12 *Certificates, Series 2003-NC10*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST
16 COMPANY AS TRUSTEE FOR THE
17 CERTIFICATEHOLDERS OF THE
18 MORGAN STANLEY ABS CAPITAL I INC.
19 TRUST 2003-NC10, MORTGAGE PASS-
20 THROUGH CERTIFICATES, SERIES 2003-
21 NC10,

Plaintiff,

vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC.; CHICAGO TITLE INSURANCE
24 COMPANY; UNITED TITLE OF NEVADA,
25 INC.; DOE INDIVIDUALS I through X; and
26 ROE CORPORATIONS XI through XX,
27 inclusive,

Defendants.

Case No.: 2:20-cv-02268-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
32-34]**

[First Request]

22 Plaintiff, Deutsche Bank National Trust Company as Trustee for the Certificateholders
23 of the Morgan Stanley ABS Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through
24 Certificates, Series 2003-NC10 (“Deutsche Bank”), Specially-Appearing Defendant Fidelity
25 National Title Group, Inc. (“Fidelity”) and Defendants Chicago Title Insurance Company
26 (“Chicago Title”) and United Title of Nevada, Inc. (“United Title”, collectively “Defendants”),
27 by and through their counsel of record, hereby stipulate and agree as follows:
28

1. On December 15, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District Court, Case No. A-20-826490-C [ECF No. 1-1];
2. On December 15, 2020, Chicago Title filed its Petition for Removal to this Court [ECF No. 1];
3. On March 31, 2021, Defendants filed their Motions to Dismiss [ECF No. 32-34];
4. Deutsche Bank's deadline to respond to Defendants' Motions to Dismiss is currently April 14, 2021;
5. Deutsche Bank's counsel is requesting an extension until May 14, 2021, to file its response to the pending Motions to Dismiss;
6. This extension is requested to allow counsel for Deutsche Bank additional time to respond to the points and authorities cited in the pending Motions to Dismiss.
7. Counsel for Defendants does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 9th day of April, 2021.

DATED this 9th day of April, 2021.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

Lindsay D. Robbins, Esq.
Nevada Bar No. 13474
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
*Attorney for Plaintiff, Deutsche Bank
National Trust Company as Trustee for the
Certificateholders of the Morgan Stanley
ABS Capital I Inc. Trust 2003-NC10,
Mortgage Pass-Through Certificates, Series
2003-NC10*

Kevin S. Sinclair, Esq.
Nevada Bar No. 12277
16501 Ventura Boulevard, Suite 400
Encino, California 91436
*Attorney for Defendants, Fidelity National
Title Group, Inc., Chicago Title Insurance
Company and United Title of Nevada, Inc.*

IT IS SO ORDERED.

Dated April 12, 2021.


UNITED STATES DISTRICT COURT JUDGE